## Case 3:24-cv-02242-L-BN Document 3 Filed 08/30/24 Page 1 of 4 PageID 5 UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

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Plaintiff  v. Sean Combo  Ciroc  Combo Combo  Defendant THE SEAN Combo Foundation	3-24 C V 2 2 4 2 - L  Civil Action No.
COMPLAINT	
COMPLAINT	
Prease see document attached.	
* Attach additional pages as needed.	
Date 18-29-2024	•
D 00	
Signature	
Print Name PShatna Lakofe	
Address Print Name Pshatna Lakose  2633 MCKunney Ave # 730	
City, State, Zip Darlas TX 75204	

404, 450,7210

Telephone

STATE OF TEXAS FEDERAL COURT	DALLAS COUNTY
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Pshatoia LaRose 2633 McKinney Ave #233 Dallas, TX 75204

Petitioner

3-24 CV2 242-L

Case No. \_\_\_\_\_

V.

Sean Combs
Ciroc
Combs Enterprises
The Sean Combs Foundation
Attn: 1505 Corporation
E Resident Agent Inc
9000 Sunset Blvd
Los Angeles, CA 90069

Re	spo	nd	ent

## PETITION AND COMPLAINT

COMES NOW, Petitioner Pshatoia LaRose, and states the following:

Plaintiff alleges that Respondent, Sean Combs through the entities of Ciroc, Combs Enterprise, The Sean Combs Foundation, as well as individually, committed the acts of violating the Trade Secrets Act of 2016, Intellectual Property Rights of Plaintiff's phone contents and conversations, which were re-used in publications, as well as the invasion of privacy and harassment. All 4 Defendants are included in this complaint. The Respondent caused harm and loss to Plaintiff both directly and indirectly through third party associations, horoscope script writings, and Respondent's brand. As a result of Respondent's actions, Petitioner has experienced severe financial loss and pain and suffering which has resulted in irreparable harm and loss to Petitioner. Plaintiff seeks damages of \$521 million. Plaintiff is requesting a Jury Trial.

Defendant has also violated the Lanham Act, which provides that "Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which—(A)is likely to cause confusion,

or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person." 15 U.S. C. § 1125(a)(1). Defendant allowed for infringement of Plaintiff's image and personal property through its ineffective protection of her data privacy, and is thus liable under the Lanham Act.

Plaintiff, Pshatoia LaRose has proceeded with filing Restraining Order against Defendant for continuous Stalking, Spying and Unauthorized Phone Tapping and Hacking in which Plaintiff is seeking to proceed with Criminal Charges as well as Civil.

Petitioner respectfully asks this Court for damages owing from Defendant's conduct, as well as for an order for Respondent to disclose all Companies, Brands, Horoscope Websites that he operates or is associated with including Third Parties, as well as for any other relief that this Court may deem proper.

Respectfully submitted,

Pshatoia LaRose

Plaintiff

provided by local rules of cour purpose of initiating the civil d	t. This form, approved by t	he Judicial Conference of th	ne United States in September	1974, is required for the use of	the Clerk of Court for the
I. (a) PLAINTIFFS PSNATNA L	arose 2633	- 4 1 / - 0	+130 DEFENDANTS Say Comps Cire Comb	ATTIN ERASI	dent Agent-INC Synsot Blyd Angles CA 9000
<b>(b)</b> County of Residence of (E.	of First Listed Plaintiff XCEPT IN U.S. PLAINTIFF CA	ISES)	County of Residence	of First Listed Defendant (IN U.S. PLAINTIFF CASES OF DINDEMNATION CASES, USE TO	
(c) Attorneys (Firm Name,	Address, and Telephone Numbe	RECE	Attorreys (! Known)	OF LAND INVOLVED.	
II. BASIS OF JURISD	ICTION (Place an "X" in	One Box Only)			Place an "X" in One Box for Plaintiff.
U.S. Government Plaintiff	3 Federal Question (U.S. Government)	CLERK, U.S. DIS NORTHERN DISTI	(For Diver ity Cases Only) TRICT COURT PROFESSOR  RIGIT OF FRANCE	ŗf DEF	
2 U.S. Government Defendant	4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citizen of Another State	2 Incorporated and I of Business In A	
			Citizen or Subject of a Foreign Country	3 Foreign Nation	6 6
IV. NATURE OF SUI		nly) ORTS	FORFEITURE/PENALTY	Click here for: Nature of S  BANKRUPTCY	OTHER STATUTES
110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgmen 151 Medicare Act 152 Recovery of Defaulted	PERSONAL INJURY  310 Airplane  315 Airplane Product Liability  320 Assault, Libel & Slander  330 Federal Employers' Liability	PERSONAL INJURY  365 Personal Injury - Product Liability  367 Health Care/ Pharmaceutical Personal Injury Product Liability  368 Asbestos Personal	625 Drug Related Seizure of Property 21 USC 881 690 Other	422 Appeal 28 USC 158 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS  820 Copyrights 830 Patent 835 Patent - Abbreviated	375 False Claims Act 376 Qui Tam (31 USC 3729(a)) 400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce 50 Deportation
Student Loans (Excludes Veterans)  153 Recovery of Overpayment of Veteran's Benefits  160 Stockholders' Suits  190 Other Contract  195 Contract Product Liability  196 Franchise	340 Marine 345 Marine Product Liability 350 Motor Vehicle 355 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury -	Injury Product Liability  PERSONAL PROPERTY  370 Other Fraud 371 Truth in Lending  380 Other Personal Property Damage  385 Property Damage Product Liability	LABOR  710 Fair Labor Standards Act  720 Labor/Management Relations  740 Railway Labor Act 751 Family and Medical	New Drug Application 840 Trademark 880 Defend Trade Secrets Act of 2016  SOCIAL SECURITY  861 HIA (1395ff) 862 Black Lung (923) 863 DIWC/DIWW (405(g))	470 Racketeer Influenced and Corrupt Organizations  480 Consumer Credit (15 USC 1681 or 1692)  485 Telephone Consumer Protection Act  490 Cable/Sat TV  850 Securities/Commodities/ Exchange
REAL PROPERTY  210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	Medical Malpractice  CIVIL RIGHTS  440 Other Civil Rights  441 Voting  442 Employment  443 Housing/ Accommodations  445 Amer. w/Disabilities - Employment  446 Amer. w/Disabilities - Other	550 Civil Rights	Leave Act 790 Other Labor Litigation 791 Employee Retirement Income Security Act  IMMIGRATION 462 Naturalization Application 465 Other Immigration Actions	864 SSID Title XVI 865 RSI (405(g))  FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS—Third Party 26 USC 7609	890 Other Statutory Actions 891 Agricultural Acts 893 Environmental Matters 895 Freedom of Information Act 896 Arbitration 899 Administrative Procedure Act/Review or Appeal of Agency Decision 950 Constitutionality of State Statutes
V. ORIGIN (Place an "X" I		555 Prison Condition 560 Civil Detainee - Conditions of Confinement  Remanded from 4	Reinstated or 5 Transfe	erred from	ict
	ite Court	Appellate Court	Reopened Anothe (specify ling (Do not cite jurisdictional sta		
VI. CAUSE OF ACTIO	INERN TO	ede secrets 1	CRETS ACT of 201	y, Lanham Act, R	PACKETER & Tochow
VII. REQUESTED IN COMPLAINT:	CHECK IF THIS UNDER RULE 2	IS A CLASS ACTION 3, F.R.Cv.P.	DEMAND'S 521,000,000	CHECK YES only JURY DEMAND:	if demanded in complaint:
VIII. RELATED CASS	E(S) (See instructions):	JUDGE	,	DOCKET NUMBER	
DATE 08-29-	2024	SIGNATURE OF ATTOR	NEY OF RECORD		
FOR OFFICE USE ONLY  RECEIPT # A!	MOUNT	APPLYING IFP	JUDGE	MAG. JUI	DGE